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June 17, 2022

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James R. Cho, U.S.M.J.
225 Cadman Plaza East
Courtroom 11D South
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)
MLLG File No.: 25-2022

Dear Judge Cho:

This office represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”) in the above-referenced case. The parties write jointly to request an extension of time of one (1) week, *nunc pro tunc*, for the parties to serve Rule 26 disclosures.

Consistent with ¶ C(2) of this Court’s Individual Practices, the parties submit that: (i) the current deadline to serve Rule 26 disclosures was June 15, 2022; (ii-iii) there have been no previous requests for an extension of time to comply with this deadline; (iv) all parties consent as this is a joint request; and (v) the parties submit that the requested extension does not affect any other scheduled Court appearance or deadline.

The reason for the request is that the parties need additional time to prepare their initial disclosures. The request for an extension was initiated on the date of the deadline by counsel for Third-Party Defendant Carlos Roa (“Roa”), to which counsel for Defendants and Plaintiff subsequently consented. Accordingly, good cause and excusable neglect exist to warrant an extension of time of this deadline from June 15, 2022 to June 22, 2022. See Fed. R. Civ. P. 6(b)(1)(B).

The parties thank this honorable Court for its time, attention, and anticipated courtesies in this case.

Dated: Lake Success, New York
June 17, 2022

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

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